

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**CLECO Power, LLC
CLECO Rodemacher Power Station
Lena, Rapides Parish, Louisiana
Agency Interest Number: 2922
Activity Number: PER20070004, PER20070005
Proposed Permit Number: 2360-00030-V1, PSD-LA-728**

I. APPLICANT

Company:
CLECO Rodemacher Power Station
2030 Donahue Ferry Rd
Pineville, Louisiana 71360

Facility:
CLECO Power, LLC
275 Rodemacher Rd
Lena, Rapides Parish, Louisiana
Approximate UTM coordinates are 526.682 kilometers East and 3473.69
kilometers North, Zone 15.

II. FACILITY AND CURRENT PERMIT STATUS

The Rodemacher Power Station (RPS) is located approximately 2.5 miles west of Boyce, Rapides Parish, Louisiana. The Power Station is bound to the east by Interstate 49, to the south by Highway 121, and to the north by Highway 8. The station is surrounded by timber and pasture.

RPS operates two electric utility units. Additional emission sources at the site include a package boiler, the material handling operations for the transfer and storage of coal (i.e. unloading, conveyors, transfer houses, storage piles, etc.), and the storage of volatile organic liquids.

Units 1 and 2 each consist of a fossil-fuel-fired boiler and a steam turbine. The fuel sources for Unit 1 include natural gas, used fuel oil, No. 2 fuel oil, and No. 6 fuel oil. The fuel source options for Unit 2 include coal in addition to natural gas (used for startup only), and No. 6 fuel oil. Each unit utilizes a boiler to convert the fossil fuel into steam. The steam powers the associated turbine, which in turn provides electricity.

Emissions are generated from Units 1 and 2 through the combustion of the fossil fuel source. Although different fuels may be utilized, each combustion source produces emissions of criteria pollutants including particulate matter less than 10 microns (PM₁₀), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC).

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Material handling sources include conveyors, a crusher house, drop points (rail car unloading, hoppers, transfer houses and storage piles), silos, storage piles, a transfer bay, transfer houses, truck loading, and materials moving on unpaved roads. Coal is delivered to RPS by rail cars, unloaded to a receiving hopper, and then conveyed through three enclosed transfer houses to the crusher house. In the crusher house, the coal is processed through crushers to allow the material to be more easily fed to the boiler of Unit 2. After the crusher house, the coal is conveyed to storage piles from where the material is fed directly to the boiler's combustion chamber and the ash is collected in silos prior to loading into trucks for transfer.

All conveyors are, at minimum, hooded. Fugitive emissions of particulate matter are generated during the conveying process. The quantity of fugitive emissions is based on the amount of material conveyed. Emissions from the facility's conveyors, including Conveyor's A, B1, C1, D, E, and F are grouped into the Coal Conveyors emission point (ID 15-96D).

CLECO Power, LLC has submitted an application requesting a Prevention of Significant Deterioration (PSD) permit for the Rodemacher Power Station Units No. 1 and 2. The proposed permit number is PSD-LA-728.

Acid Rain Permit No. 2360-00030-IV3 has been issued to the complex. CLECO Rodemacher Power Station is a designated Part 70 source.

The Rodemacher Unit 3 is a contiguous facility, operating under Part 70 Permit No. 2927-V0, Prevention of Significant Deterioration (PSD) Permit No. PSD-LA-711, and Acid Rain Permit No. 2927-IV0, all issued February 23, 2006.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on July 2, 2007 requesting a Part 70 operating permit for the Rodemacher Power Station. Additional information dated September 4, 2007, September 27, 2007, and November 28, 2007 was also submitted.

Project

The project involves the retrofitting of the Unit No. 2 Boiler with low NO_x burners and the addition of over-fire air to further reduce NO_x emissions. The project is expected to reduce approximately 4,700 tons per year of NO_x. The addition of over-fire air is also expected to result in an increase in carbon monoxide (CO) emissions of approximately 1,600 tons per year.

As a result of the addition of over-fire air to the Unit 2 Boiler, CO emissions would increase above the significance level for PSD. Proposed PM₁₀, SO₂, and VOC emissions are not affected by the proposed project. Potential and actual NO_x emissions will be substantially reduced.

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Proposed Permit

Permit 2360-00030-V1 will be the modification of Part 70 operating permit 2360-00030-V0 for the Rodemacher Power Station. PSD-LA-728 will be the initial PSD permit for Rodemacher Power Station Unit (Boiler) No. 2.

Permitted Air Emissions

Estimated emissions from the RPS in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	3,310.92	3,310.92	-
SO ₂	43,360.10	43,360.10	-
NO _x	18,165.10	13,398.10	- 4,767.00
CO	3,501.80	5,113.80	+ 1,612.00
VOC *	277.05	277.05	-

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

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Applicability and Exemptions of Selected Subject Items

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF 1 Rodemacher Power Station	Chapter 22. Control of Emissions of Nitrogen Oxides (NO _x) – Affected Facilities in the Baton Rouge Nonattainment Area and the Region of Influence (LAC 33:III.2201)	DOES NOT APPLY. Facility is not located in the Baton Rouge Nonattainment area or Region of influence.
	Chapter 51. Comprehensive Toxic Air Pollution Emission Control Program Subchapter A. Prohibited Activities and Special Provisions (LAC 33:III.5105.A.2)	EXEMPT. Facility is exempt from the requirements of Subchapter A per provisions of LAC 33:III.5105.B.2 and 5105.B.3.a. Electric utility steam-generating units are exempt from Chapter 51 in accordance with LAC 33:III.5105.B.2. Emissions from the combustion of Group 1 fossil fuels (natural gas, liquid petroleum gas, distillate fuel oil, gasoline, diesel, and refinery fuel gas) are exempt in accordance with LAC 33:III.5105.B.3.a. Emissions from the combustion of Group 2 fossil fuels (coal, residual fuel oil, and pet coke) vented from a stack that has downwash minimization stack height or a height approved by the LDEQ are exempt in accordance with LAC 33:III.5105.B.3.b.
	Chapter 59. Chemical Accident Prevention and Minimization of Consequences Subchapter B. Risk Management Program Requirements – Registration for Stationary Sources (LAC 33:III.5907)	DOES NOT APPLY. The facility does not produce, process, handle or store any substance listed in 40 CFR 68.130 or Table 59.1 and Table 59.1 of Chapter 59 in an amount greater than the threshold quantity as determined in the manner described in 40 CFR 68.115.

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ID No:	Requirement	Notes
UNF 1 (cont.)	NESHAP Subpart-A General Provisions [40 CFR 63.1-15]	DOES NOT APPLY. All affected (NESHAP) stationary sources shall comply with applicable provisions of this Subpart. Facility is not subject to MACT standards under 40 CFR part 63 in accordance with the EPA removal of coal-fired and oil-fired electric utility steam generating units from the CAA 112(c) source category list on March 29, 2005.
	Compliance Assurance Monitoring (CAM) [40 CFR 64]	EXEMPT. 40 CFR 64.5 Deadlines for Submittals allows the facility to submit the Compliance Assurance Monitoring plan at the first renewal of the Part 70 Operating permit.
	Chemical Accident Prevention Provisions [40 CFR 68]	DOES NOT APPLY. The facility does not produce, process, handle or store any substance listed in 40 CFR 68.130 in an amount greater than the threshold quantity as determined in the manner described in 40 CFR 68.115.
	Protection of Atmospheric Ozone [40 CFR 82]	DOES NOT APPLY. The facility does not produce, transform, destroy, import or export a controlled substance or import or export a controlled product
1-72 Unit 1 Boiler	Subpart D – Standards of Performance Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971 [40 CFR 60.40]	DOES NOT APPLY – Per State Permit No. 131 issued on November 28, 1972, boiler was classified as an existing source as of August 17, 1971.

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ID No:	Requirement	Notes
Unit 1 Boiler (continued)	Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)(2)]	DOES NOT APPLY. No construction, modification, or reconstruction after September 18, 1978.
	Acid Rain Nitrogen Oxides Reduction Program [40 CFR 76.1-76.15]	DOES NOT APPLY. The regulation applies to a coal-fired utility unit subject to the Acid Rain emissions limitations or reduction requirement for SO ₂ under Phase 1 or Phase 2 pursuant to sections 404, 405 or 409 of the Act. Unit is not a coal-fired utility unit.
1-73 Package Boiler	Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for which construction is commenced after August 17, 1971 [40 CFR 60.40(a)(1)]	DOES NOT APPLY. Capacity is less than 250 MMBtu/hr Maximum heat input of the unit is 106 MMBtu/hr.
	Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	DOES NOT APPLY. Capacity is less than 100 MMBTU/hr and no construction, modification or reconstruction after June 19, 1984.
	Acid Rain [40 CFR 72.1-72.96]	EXEMPT. The package boiler is not a “utility unit” as defined at 40 CFR 72.2 and is exempt from the Acid Rain Program per 40 CFR 72.6 (b) (8).
1-74 Unit 2 Boiler	Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)(2)]	DOES NOT APPLY. A standard does not apply within Subpart Da for CO, the pollutant increased by this modification.
1-96 Tank 101 2-96 Tank 102	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	DOES NOT APPLY. Maximum true vapor pressure is less than 1.5 psia.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
3-96 Tank 103 4-96 Tank 104 5-96 Tank 105 6-96 Tank 106 (continued)	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. No. 6 Fuel Oil is not a petroleum liquid per 40 CFR 60.111(b)
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. No construction, modification, or reconstruction after May 18, 1978.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.116b]	DOES NOT APPLY. No construction, modification, or reconstruction after July 23, 1984.
07-96 Diesel Tank	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. Maximum true vapor pressure is less than 1.5 psia.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Tank capacity is less than 40,000 gallons
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. Tank capacity is less than 40,000 gallons

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
Tank 07-96 (continued)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.116b]	DOES NOT APPLY. No construction, modification, or reconstruction after July 23, 1984.
08-96 Condensate Drip Tank	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Exempt per LAC 33:III.2103.G.1.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Tank capacity is less than 40,000 gallons
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. Tank capacity is less than 40,000 gallons and no construction, modification, or reconstruction after May 18, 1978.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.116b]	DOES NOT APPLY Tank capacity is less than 10,000 gallons and no construction, modification, or reconstruction after July 23, 1984.
09-96 Unit 1 Day Tank	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	DOES NOT APPLY. Maximum true vapor pressure is less than 1.5 psia
10-96 Unit 2 Day Tank	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. No. 6 Fuel Oil is not a petroleum liquid per 40 CFR 60.111(b)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
Tanks 09-96 & 10-96 (continued)	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. No construction, modification, or reconstruction after May 18, 1978.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.116b]	DOES NOT APPLY. No construction, modification, or reconstruction after July 23, 1984.
15-96A Bulldozer (Coal) Emissions 15-96B Coal Grading	NSPS Subpart Y - Standards of Performance for Coal Preparation Plants [40 CFR 60.250(b)]	DOES NOT APPLY. The equipment is not used to convey coal to or remove coal and refuse from machinery used to reduce the size of coal or to separate coal from refuse.
18-96 and 19-96 Package Boiler Tanks 1 and 2	Storage of Volatile Organic compounds [LAC 33:III.2103.B]	DOES NOT APPLY. Maximum true vapor pressure is less than 1.5 psia
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. No. 2 Fuel Oil is not a petroleum liquid per 40 CFR 60.111(b)
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Volatile Organic Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. No construction, modification, or reconstruction after May 18, 1978.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
Tanks 18-96 & 19-96 (continued)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.116b]	DOES NOT APPLY. No construction, modification, or reconstruction after July 23, 1984.

Prevention of Significant Deterioration

As a result of the addition of over-fire air to the Unit 2 Boiler, CO emissions would increase above the significance level for PSD. Proposed PM₁₀, SO₂, and VOC emissions are not affected by the proposed project. CLECO projects that potential and actual NO_x emissions will be significantly reduced. CLECO has proposed good combustion practices as Best Achievable Control Technology (BACT) for CO emissions.

Estimated emissions, in tons per year, are as follows:

Pollutant	Baseline Actual Emissions 05-06	Projected Actual Emissions	Net Emissions Increase	PSD de minimis	Review required?
NO _x	7624.50	7155.00	- 469.50	40	No
CO	530.00	3577.40	+ 3047.40	100	Yes

Streamlined Equipment Leak Monitoring Program

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Rodemacher Power Station	None	-	-

MACT Requirements

MACT is not required for this facility or the sources contained therein. This facility is a major source of toxic air pollutants (TAP) pursuant to LAC 33:III.Chapter 51, but is exempt from the requirements of Subchapter A. As per provisions of LAC 33:III.5105.B.2 and 5105.B.3.a, electric utility steam-generating units are exempt from Chapter 51 in accordance with LAC 33:III.5105.B.2. Emissions from the combustion of Group 1 fossil fuels (natural gas, liquid petroleum gas distillate fuel oil, gasoline, diesel, and refinery fuel gas) are exempt in accordance with LAC 33:III.5105.B.3.a. Emissions from the combustion of Group 2 fossil fuels (coal, residual fuel oil, and pet coke) vented from a stack that has downwash minimization

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stack height or a height approved by the LDEQ are exempt in accordance with LAC 33:III.5105.B.3.b.

Air Quality Analysis

Because ISCST3 modeling analyses indicated concentrations of CO would be below the PSD ambient significance level, refined NAAQS modeling was not required.

Screen modeling indicates that CO ground level concentrations are below the 1-hour and 8-hour PSD ambient significance levels. The predicted maximum 1-hour offsite ground level concentration for CO is $230.28 \mu\text{g}/\text{m}^3$. This concentration is below the 1-hour PSD significance level of $2,000 \mu\text{g}/\text{m}^3$. The predicted maximum 8-hour offsite ground level concentration for CO is $58.83 \mu\text{g}/\text{m}^3$. This concentration is below the maximum 8-hour significance level of $500 \mu\text{g}/\text{m}^3$. Therefore, pre-construction monitoring and refined NAAQS modeling were not required.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield was requested in the permit application. The permit shield request was determined to be invalid because the request lacked the detail necessary for LDEQ to make a determination. Therefore, no permit shield will be granted in this permit modification.

VI. PERIODIC MONITORING

40 CFR 64.5: Deadlines for Submittals allows the facility to submit the Compliance Assurance Monitoring plan at the first renewal of the Part 70 Operating permit; this is a modification.

Low NO_x burners and over-fire air are considered passive controls and therefore are not subject to compliance monitoring.

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As an alternative to continuous monitoring of SO₂ emissions from the Unit 1 Boiler (EQT02), LDEQ has approved the use of fuel sulfur monitoring pursuant to the requirements of 40 CFR 75 Appendix D.

In order to determine NO_x emissions from the Unit 1 Boiler (EQT02), CLECO shall install, certify, operate, and maintain a NO_x-diluent continuous emission monitoring system (CEMS) in accordance with the requirements of 40 CFR 75.

CLECO shall install, certify, operate, and maintain a continuous opacity monitoring system (COMS) as required in 40 CFR 75.10(a)(4) for the Unit 1 Boiler (EQT02).

CLECO shall monitor CO, NO_x, and opacity by continuous emissions monitor (CEM) as described in 40 CFR 60.45 for the Unit 2 Boiler (EQT04).

CLECO shall monitor SO₂ by CEM as required in LAC 33:III.1511.A for the Unit 2 Boiler (EQT04).

CLECO shall monitor filter vents by visual inspection weekly according to LA Policy incorporated by LAC 501.C.6 for the 11-96 Coal Dust Collection System (EQT015), 12-96 Central Vacuum Cleaning System (EQT016), 13-96 Fly Ash Dust Collector (EQT017), and 16-96 Fly Ash Loading Emissions (FUG06).

CLECO shall monitor filter elements (bags) by technically sound method once every six (6) months according to LA Policy incorporated by LAC 501.C.6 for the 11-96 Coal Dust Collection System (EQT015), 12-96 Central Vacuum Cleaning System (EQT016), 13-96 Fly Ash Dust Collector (EQT017), and 16-96 Fly Ash Loading Emissions (FUG06).

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.